

CORRES. CONTROL

LTR. NO.

K-H Corres. #

Originator Ltr Log #

MCB-003-97

97 - RF -

DIST.	LTR	ENC
BARTHEL, J.M.		
BENGEL, P.R.		
BENSON, C.A.		
CARMEAN, C.H.		
DAWSON, D.		
EDWARDS, J.D.		
FINDLEY, M.E.		
FITZ, R.C.		
GUINN, L.A.		
HUGHES, F.P.		
MCANALLY, J.L.		
POWER, A.P.		
REED, A.B.		
TYSON, A.M.		
WAGNER, M.J.		
WHEELER, M.		

DiGregorio, G	✓	
Luker, S	✓	
Myrick, S	✓	
Piers, V	✓	
Crimrose, A	✓	
Sepples, W	✓	
File	✓	✓

IMRS RECORDS	X	X
IF CORRES. CONTROL	X	X
RAFFIC		
ATS/T130G		

CLASSIFICATION:

CNI		
NCLASSIFIED		
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER
SIGNATURE:

Date: 1-27-98

REPLY TO RF CC NO.:

ACTION ITEM STATUS:

☐ PARTIAL/OPEN☐ CLOSED

TR APPROVALS:

MCB
TRIG & TYPIST INITIALS:
MCB/aw

46469 (Rev. 1/97)

Rocky Mountain
Remediation Services, L.L.C.

... protecting the environment

Flats Environmental Technology Site

: 464

Colorado 80402-0464

(303) 966-7000



000068480

January 27, 1998

Don Barbour
STARMET Corporation
Director of Technical Marketing
681 Emory Valley Road
Oakridge, TN 37830-9004

TRANSMITTAL OF COMMENTS FOR STARMET'S DRAFT WORKPLAN FOR PYROPHORIC DEPLETED URANIUM SOURCE REMOVAL FROM ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE T-1 TRENCH (IHSS 108) - MCB-003-98

Attached are the Review Comment Sheets for the "Draft Workplan for Pyrophoric Depleted Uranium Source Removal from Rocky Flats Environmental Technology Site (RFETS) T-1 Trench (IHSS 108)." Comments should be dispositioned on each individual Review Comment Sheet.

The review was conducted by Kaiser-Hill (K-H), Rocky Mountain Remediation Services, L.L.C. (RMRS), DynCorp, and Safe Sites of Colorado, L.L.C. (SSOC) in parallel to maintain the Trench 1 project schedule. In order to avoid schedule delays, the Final Workplan and responses to comments should be submitted to RMRS within ten (10) working days.

If you have any questions or concerns, please contact me at (303) 966-5891.

M. C. Burmeister
Project Manager

MCB/aw

Attachments:
As Stated

CC:

C. Hull - Stoller, w/Attach.

N. Lombardo - Stoller



ADMIN RECORD
1108-A-00012

REVIEW COMMENT SHEET

Please review the attached procedure:

Comment Due Date: 1/22/98

Number

Rev.

Draft

Prepared by: [Signature] Title: [Signature]
 A/E/T-1 Trench Work Place

☐ Internal Review

☐ Parallel Review

☐ Verification

☐ Validation

☐ Revalidation

General (G) comments require resolution but do not require resolution acceptance. Mandatory (M) comments require resolution and resolution acceptance.
 1-88000-PP-004 provides complete definitions of General and Mandatory comments.

ITEM G or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INIT/DATE
M	9	3.13	The HSS - MS Nings, is the responsible for the Trench T-1 project. Is this at the EFTS or in Beaumont as well? The Introduction includes treatment operation. Is there a separate plan for Beaumont?		
M	9	3.12	Is the QA/QC officer responsible for installing the QA/QC at EFTS or Beaumont or both? The Introduction includes treatment operation. Is there a separate plan for Beaumont?		
#	14	#2	What will the boxes be inspected for? There should be a standard inspection checklist developed for each box for traceability purposes.		

POC/Reviewer: (Comments not signed by Reviewer/POC will be considered unofficial and not subject to resolution)

No Comments

This procedure revision has no impact or relevance to our discipline or organization and we waive need to concur. We acknowledge this concurrence waiver does not affect our responsibility to implement the requirements of this procedure when needed.

[Signature]
 Name

[Signature]
 Signature

Ext./Pager/Fax

Bldg./Dept.

1/24/98
 Date

Return to:

FAX

Name

X

Ext.

Location

If questions on content, please call the SME:

Name

Ext.

REVIEW COMMENT SHEET (continued)

Page 2 of 2

Review comments for document:

Pyrophore Deleted Version Submitted from RHTS
Trench 11 Work Plan

Rev.

Draft

ITEM G or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INIT/DATE
MM	21	5.1	In the weekly reports, discussions identified need to be followed up with NEPS and corrective actions. Identification and explanation is not adequate.		
MM	-	-	Other plans will be reviewed separately - HSR, SAR, GAPPB.		

OC/Reviewer: (Comments not signed by the Reviewer/POC will be considered as unofficial comments)

Greg D'Amico

Name

Greg D'Amico

Signature

1/26/93

Date

Resolutions Accepted

Initials

Date

REVIEW COMMENT SHEET

Please review the attached procedure:

Number

Rev.

Draft

Comment Due Date: 1/22/98

Title

Starmet Workplan / 7-1

☐ Internal Review

☐ Parallel Review

☐ Verification

☐ Validation

☐ Revalidation

QA Peer

General (G) comments require resolution but do not require resolution acceptance. Mandatory (M) comments require resolution and resolution acceptance.

ITEM or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INIT/DATE
G	13	Intact Drawn last paragraph	Last sentence may want to include who their carrier is. The last paragraph makes it sound like they put it on a starmet truck if it goes.		
G	15	3.2.2.5	1 st paragraph after bullets - describe what will be sampled & in accordance with kmms SAP but the role of who is responsible for taking the sample is omitted.		
G	15	3.2.2.7	Labels types will be determined by Transportation. We should check to see if this description meets what transportation has decided for labeling. Also it is unclear who will label the drums.		

OC/Reviewer: (Comments not signed by Reviewer/POC will be considered unofficial and not subject to solution)

No Comments

This procedure revision has no impact or relevance to our discipline or organization and we waive need to concur. We acknowledge this concurrence waiver does not affect our responsibility to implement the requirements of this procedure when needed.

Susan Myrick

Name

J. T. Myrick

Signature

505/4343/4045

Ext./Pager/Fax

8338 PMAS

Bldg./Dept.

Date

Return to:

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Name

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Location

If questions on content, please call the SME:

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REVIEW COMMENT SHEET (continued)

Review comments for document: _____

Number _____

Rev. _____

Draft _____

ITEM 3 or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INITIAL/DATE
5			Will they be able to use the compensating tool with the lid on the drum & only a hole in the top?		
5	13		Paragraph 2 Last Sentence, they made it sound like they will perform the task of installing the gaskets. I thought the drums come with a gasket.		

DOC/Reviewer: (Comments not signed by the Reviewer/POC will be considered as unofficial comments)

Name _____

Signature _____

Date _____

Resolutions Accepted

Initials _____

Date _____

REVIEW COMMENT SHEET

Page 1 of 2

Please review the attached procedure:

Number 1-13-95

STANMET ORAET WORK PLAN

Comment Due Date:

Title

☒

Internal Review

☐

Parallel Review

☐

Verification

☐

Validation

☐

Revalidation

General (G) comments require resolution but do not require resolution acceptance. Mandatory (M) comments require resolution and resolution acceptance.

ITEM 3 or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INIT/DATE
6	8		Somewhere we need to document requirements for startmet to participate in cold "meet ups", pre-operational drills, etc.		
6	9	3.1.3 3.1.4 3.1.5	Include requirements for personnel to participate in self-assessment program.		
6	12	3.2.2.2	If Rums is supplying RCT support why is startmet supplying radiological equipment?		

OC/Reviewer: (Comments not signed by Reviewer/POC will be considered unofficial and not subject to resolution)

No Comments

This procedure revision has no impact or relevance to our discipline or organization and we waive need to concur. We acknowledge this concurrence waiver does not affect our responsibility to implement the requirements of this procedure when needed.

P. A. WAGNER

Signature

Name

3102/1164

78438/5R/722541 1-19-95

Ext./Pager/Fax

Bldg./Dept.

Date

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X

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If questions on content, please call the SME:

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Page 2 of 2

Draft

Data

REVIEW COMMENT SHEET

Page 1 of 1

Please review the attached procedure:

Number

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Draft

Title

Comment Due Date: 1-22-98

☒ Internal Review

☐ Parallel Review

☐ Verification

☐ Validation

☐ Revalidation

QA Peer X

General (G) comments require resolution but do not require resolution acceptance. Mandatory (M) comments require resolution and resolution acceptance.

1-88000-PP-004 provides complete definitions of General and Mandatory comments.

ITEM G or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INIT/DATE
G	6	2.1	Change (CERCLA) to (CERCLA)		
G	14	Record Keeping	What kind of info on decontamination will you maintain? - Fast clean survey results, clean attempts, clean methods, etc.? Do you want to be specific?		
G		Figure 4.	The flowchart for the T-1 Trench Material Handling Activities has changed since 1-14-98.		

POC/Reviewer: (Comments not signed by Reviewer/POC will be considered unofficial and not subject to resolution)

No Comments

This procedure revision has no impact or relevance to our discipline or organization and we waive need to concur. We acknowledge this concurrence waiver does not affect our responsibility to implement the requirements of this procedure when needed.

Antones

Signature

Name

8098/6256/3621 T664A Waste Disposal 1-19-98

Ext./Pager/Fax

Bldg./Dept.

Date

Return to:

FAX

Name

X

Ext.

Location

If questions on content, please call the SME:

Name

Ext.

REVIEW COMMENT SHEET

Please review the attached procedure: _____

Number _____

Rev. _____

Draft _____

Starrett Draft work Plan

Title _____

Comment Due Date: 1-22-98

☐ Internal Review

☐ Parallel Review

☐ Verification

☐ Validation

☐ Revalidation

General (G) comments require resolution but do not require resolution acceptance. Mandatory (M) comments require resolution and resolution acceptance.

ITEM 3 or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INIT/DATE
6	4	Acronym List	Add "FIDLER" Field Instrument for the Detection of Low-Energy Radiation. Change Radiation Work Permit to "Radiology Work Permit"		
M	13	Last Para. Intact Drawings	Change "a radiation survey is" to "radiation and contamination surveys are"		
M	17	Last sentence	Delete reference to RWP.		

QC/Reviewer: (Comments not signed by Reviewer/POC will be considered unofficial and not subject to resolution)

No Comments

This procedure revision has no impact or relevance to our discipline or organization and we waive need to concur. We acknowledge this concurrence waiver does not affect our responsibility to implement the requirements of this procedure when needed.

John Miller

Name

Signature

2454/7981/3407

713013 RE

Bldg./Dept.

1-22-98

Ext./Pager/Fax

Date

Return to:

FAX _____

Name _____

Ext. _____

Location _____

If questions on content, please call the SME:

Name _____

Ext. _____

REVIEW COMMENT SHEET (continued)

Review comments for document: _____

Number _____

Rev. _____

Draft _____

ITEM G or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INIT/DATE
G	19	2nd Para. last Para.	Delete Para. Change "micro-R meter" to "FIDUER"		
G		Flow charts	Delete flow charts with new revisions from last ACE mtg.		
G		Fig. 6	If it appears from was briefed dry of dry intact down is identified, The action to carry out min oil should be coordinated by CEC Eng.		
			would put together work plan		

OC/Reviewer: (Comments not signed by the Reviewer/POC will be considered as unofficial comments)

Name John Miller

Signature [Signature]

Date 1-22-98

Resolutions Accepted

Initials _____

Date _____

REVIEW COMMENT SHEET (continued)

Page 1 of 1

Review comments for document:

STANLEY'S T-1 WORK PLAN

Number

Rev.

Draft

ITEM G or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INITIAL/DATE
G	11	3.2.2.1	STARTS WITH: "ALL PERSONNEL..." IS THIS ALL STANLEY PERS. OR ALL PEOPLE WORKING IN SIP OR WHAT?		
M	12	3.2.2.2	"FIDLER" IS ALL CAPITAL LETTERS.		
M	12	3.2.2.3 4TH PAGE.	5TH SENTENCE "PAGE REQUEST CONTAMINATION CONCUTATIONS" DO THESE INCLUDE RADOS & CHEM? IF SO, SPECIFY ISOTOPES FOR RADOS.		
M	14	2ND PAGE.	"THE BOXER WILL BE INSPECTED & SAMPLED." SAMPLED FOR WHAT?		
<p>OC/Reviewer: (Comments not signed by the Reviewer/POC will be considered as unofficial comments)</p> <p>H. B. ESTHERSON</p> <p>Name</p> <p>Signature</p> <p>1/24/15</p> <p>Date</p> <p>Resolutions Accepted</p> <p>Initials</p> <p>Date</p>					

REVIEW COMMENT SHEET

Time Spent on Review: 2 hrs.

Return to:

4046

Mark Burmeister

FAX

Name

5891

Ext.

Bldg, 893B

Location

If questions on content, please call the SME:

Donald Barbour

Name

423-220-8300

Ext.

Page 1 of 3

Please review the attached procedure:

Number

0

Rev.

DRAFT

Work Plan-Pyrophoric Depleted Uranium Source Removal from Rocky Flats Environmental Technology Site T-1 Trench I (IHSS-108) January 13, 1998

Comment Due Date:

☐ Internal Review

☒ Parallel Review

☐ Verification

☐ Validation

☐ Revalidation

General (G) comments require resolution but do not require resolution acceptance. Mandatory (M) comments require resolution and resolution acceptance. 1-A03-PPG-004 provides complete definitions of General and Mandatory comments.

TYPE G or M	PAGE	SECTION OR LINE #	COMMENT	DISPOSITION	Disposition Accepted INIT/DATE
M	5	1 Introduction	The last sentence of the first paragraph should also include the Sampling and Analysis Plan as stated in the "List of Appendices".		
G	8-10	Sect. 3.1	General comment- perhaps the personnel descriptions should include the breakdown of personnel responsibilities in regard to on-site (RFETS) activities, and off-site (Starmet) activities (ie. Debra Nims is the Lead HSS for on-site activities, however I believe Eric Bickel acts in this function at Starmet). Also, will Doug Gail / Geoff Asmus perform the sampling functions at Starmet?		
G	10/11	Sect. 3.2.1	Clarification of the last sentence on pg. 10/first sentence on pg. 11: RMRS will perform the field screening evaluations as indicated in ACE, however, these field instruments may or may not be able to identify Pu, and or U-235. Starmet will remove a representative sample of the contents of each drum or box in accordance with the Starmet SAP. The sample will then be transferred from Starmet to RMRS for analysis via gamma spectroscopy. Gamma spectroscopy results should be available in 3-4 hours.		
G	11	Sect. 3.2.1	Please clarify in the third sentence of the first paragraph, the "hole pierced in the drum will be enlarged", the most recent ACE discussion indicated the piercing tool would be large enough to create a hole large enough to sample and inspect the drum. Two separate piercing tools would not be required.		
G	12	Sect. 3.2.2.2	Presently, RMRS plans on providing basic PPE needs (gloves, tyvec, hoods, booties) for the project. If Starmet requires additional PPE other than the standard, Starmet must supply.		

POC/Reviewer: (Comments not signed by POC/Reviewer will be considered unofficial and not subject to resolution)

n No Comments

n This procedure revision has no impact or relevance to our discipline or organization and we waive need to concur.

Mark Burmeister

Name

Signature

x5891/0-4630/hax4046

Ext./Pager/Fax

T-893B/ER Projects

Bldg/Dept./AGM

1/27/98

Date

Resolutions Accepted

Initials

Date

NOTE: These reviews are completed by qualified reviewers in accordance with 1-A03-PPG-004 in concert with 1-A01-PPG-001 and 1-A02-PPG-003.

REVIEW COMMENT SHEET

Time Spent on Review: 2 hrs.

If questions on content, please call the SME:

Return to: 4046 Mark Burnmeister x5891/d-4630 T-893B/ER Projects Don Barbour 423-220-8300
 FAX Name Ext. Location Name Ext. Page 2 of 3

Please review the attached procedure: Number 0 DRAFT Work Plan-Pyrophoric Depleted Uranium Source Removal from Rocky Flats Environmental Technology Site T-1 Trench 1 (IHSS-108) January 13, 1998
 Comment Due Date: Rev. Draft

☐ Internal Review ☒ Parallel Review ☐ Verification ☐ Validation ☐ Revalidation
 General (G) comments require resolution but do not require resolution acceptance. Mandatory (M) comments require resolution and resolution acceptance.
 1-A03-PPG-004 provides complete definitions of General and Mandatory comments.

TYPE G or M	PAGE	SECTION OR LINE #	COMMENT	DISPOSITION	Disposition Accepted INIT/DATE
G	12	3.2.2.3	Last paragraph of this section, please note that the sampling discussed here will be in accordance with the approved Sampling and Analysis Plan.		
M	13	3.2.2.4	In the first full sentence, it is indicated that RMRS will handle unknown wastes. Revise this statement to reflect the fact that Starmet is responsible for handling, sampling, and repackaging these materials.		
M	13	Intact Drums	First paragraph, last sentence; revise to indicate that "Drums of liquids will be returned to RMRS for disposition, after sampling for characterization by Starmet."		
G	13	Nom. Intact Leaky Drums	It would be my suggestion to sample <u>after</u> inserting with mineral oil.		
M	17	3.2.2.9 Decon.	The last paragraph references several RFETS procedures. The procedures referenced are in error. Footnote for decontamination at the Main Decontamination Pad only. Also note that FO.07 is utilized for handling/disposition of decon. and wash waters.		
M	17	3.2.2.9 Cont. Contr.	The first sentence should be revised to reflect the fact that a single HASP will be generated for this project which will control work activities for both Starmet and RMRS. This comment should be incorporated throughout the document.		
M	19	3.2.2.9 Small Equip. Decon	Please note any waste waters generated during decon activities shall be sampled in accordance with the Starmet SAP to determine final disposition.		
M	21	5.2	The first sentence shall be revised as follows: "Starmet will provide the RMRStreatment and packaging."		
POC/Reviewer: (Comments not signed by POC/Reviewer will be considered unofficial and not subject to resolution)			Resolutions Accepted		
n No Comments					
n This procedure revision has no impact or relevance to our discipline or organization and we waive need to concur.					
Mark Burnmeister					
Name					
5891/4630					
Ext./Pager/Fax					
T-893 B					
Bldg/Dept./AGM					
1/27/98					
Date					
Initials					
Date					

NOTE: These reviews are completed by qualified reviewers in accordance with 1-A03-PPG-004 in concert with 1-A01-PPG-001 and 1-A02-PPG-003.

Time Spent on Review: 2 hrs.

REVIEW COMMENT SHEET

Return to:

4046 Mark Burmeister

FAX Ext. Location

If questions on content, please call the SME:

5891 T-893B Don Barbour

Ext. 423-220-8300 Name Page 3 of 3

Please review the attached procedure:

Number 0 DBAFL Work Plan-Pyrophoric Depleted Uranium Source Removal from
Rev. Draft Rocky Flats Environmental Technology Site T-1 Trench I (IHSS-
108) January 13, 1998

Comment Due Date:

☐ Internal Review ☒ Parallel Review ☐ Verification ☐ Validation ☐ Revalidation

General (G) comments require resolution but do not require resolution acceptance. Mandatory (M) comments require resolution and resolution acceptance.
1-A03-PPG-004 provides complete definitions of General and Mandatory comments.

TYPE G or M	PAGE	SECTION OR LINE #	COMMENT	DISPOSITION	Disposition Accepted INIT/DATE
M	21	5.2	Add to bullets; "Quantity of material recycled for beneficial re-use".		
M		Figures 4-8	Ensure flow charts are consistent with the Final ACE document.		
G		Appendix C	General comment: The Starmet HASP will be incorporated into the RMRS Project Specific HASP for the Trench 1 Project.		
G			Please note in the document that: Starmet should plan on providing a scale or scales to weigh packages and drums. Also, is a flow meter or other metering/measuring instrument required to track the volume and weight of mineral oil / dry soils being introduced into the drums and steel boxes?		
G			Starmet should plan on keeping detailed records of the mass/types of materials added to various waste packages so that container activity can be extrapolated from analytical results.		

POC/Reviewer: (Comments not signed by POC/Reviewer will be considered unofficial and not subject to resolution)

n No Comments
n This procedure revision has no impact or relevance to our discipline or organization and we waive need to concur.

MC Burmeister

Name

Signature

5891/4630
Ext./Pager/Fax

T-893B

Bldg./Dept./AGM

1/27/98
Date

Resolutions Accepted

Initials

Date

NOTE: These reviews are completed by qualified reviewers in accordance with 1-A03-PPG-004 in concert with 1-A01-PPG-001 and 1-A02-PPG-003.

cc:Mail for: Mark Burmeister

Subject: Comments regarding STARMET Draft Work Plan
From: Kenneth Lenarcic at echo14 1/26/98 5:01 PM
To: Mark Burmeister at Delta13
To: Annette Primrose at Alpha10
cc: Susan Myrick at Mail1
cc: Jeanett Watkins at Charlie12
cc: Douglas Parker at Mail4
cc: Vic Ament at Mail3

As usual, I am a little late with my comments. Original signed comment sheets will follow with this attachment by site mail.

Sec 3, Pg 8 No STARMET employee responsible for packaging at the T-1 location was identified.

Sec 3.2.1 Pg 11 Comingling DU & Soil does not provide compliance with 49CFR. This statement must be revised once STARMET has provided a technical justification that methods used meet letter and spirit of regulations.

Sec 3.2.2.1 All hazmat employers must identify and train hazmat employees in accordance with 49CFR 172.700. None are identified.

Sec 3.2.2.2 DCI will provide waste packages and QA.

Removal of subcontractor equipment subject to HSP 18.10

Radiological Sources in instruments subject to site source control program.

Intact drums Packaging plan subject to review. This applies to other waste packaging described in this section also.

DCI will provide compliant manifest.

3.2.2.2.7

Is Starmet an approved K-H waste recipient?

Agree to PSN but cannot agree to Y-II label until radiological surveys have been completed.

How will activity per package be determined?

Required for both RQ and shipping papers.

DCI will inspect blocking and bracing prior to approval of off site shipment. Starmet should develop a blocking and bracing plan. Vehicles used for transport will be given a Commercial Vehicle Safety Alliance Inspection prior to loading.

Will there be any testing to determine whether or not these materials actually meet the definition of a DOT hazard class?

3.2.2.2.8

Waste certification and Traffic Management must be present at STARMET to ship to a DOE facility.

Appendix

None of the plans address transportation or packaging issues. Is there a packaging QA plan?

I hope that the technical basis for transportation and packaging compliance STARMET will be delivering will address my questions. The work plan however must still match the packaging plan.

Ken

REVIEW COMMENT SHEET

Page 1 of 4

Please review the attached procedure:

Number

Rev.

Draft

Title

Comment Due Date: 1/22/98

☒ Internal Review

☐ Parallel Review

☐ Verification

☐ Validation

☐ Revalidation

General (G) comments require resolution but do not require resolution acceptance. Mandatory (M) comments require resolution and resolution acceptance. 1-88000-PP-004 provides complete definitions of General and Mandatory comments.

ITEM G or M	PAGE	SECTION OR STEP	COMMENT	RESOLUTION	Resolution accepted INIT/DATE
			SEE COMMENTS 1 THROUGH 16 ON ATTACHED PAGES (3 TOTAL) 17		
			NOTE: DID NOT LOOK AT QA PLAN OR HEALTH & SAFETY PLAN ATTACHES.		

POC/Reviewer: (Comments not signed by Reviewer/POC will be considered unofficial and not subject to resolution)

No Comments

This procedure revision has no impact or relevance to our discipline or organization and we waive need to concur. We acknowledge this concurrence waiver does not affect our responsibility to implement the requirements of this procedure when needed.

TRACY SPENCE

Tracy Spence

Signature

4322/6152

TR438

Bldg/Dept.

1/26/98

Date

Return to:

FAX

Name

Ext.

Location

If questions on content, please call the SME:

Name

Ext.

REVIEW COMMENT SHEET ATTACHMENT FOR STARMET DRAFT WORK PLAN

1. Page 11, Section 3.2.1, ITEM: G
 Comment:
 Second to last sentence: After "...the drum will be enlarged", add **or the drum lid will be removed, if practicable.**
2. Page 12, Section 3.2.2.4, ITEM: M
 Comment:
 It may not be possible for RMRS to "segregate and inspect" all solid materials and sludges, as indicated in first sentence of second paragraph, since some of the materials may be containerized and unidentifiable inside the container. RMRS will excavate and transfer all containerized materials to the SIP for inspection, segregation, sampling, and packaging by the subcontractor, as stated in Section 4.5 of the SOW. Revise text to be consistent with SOW.
3. Page 13, Section 3.2.2.4, ITEM: M
 Comment:
 RMRS will manage uncontainerized suspected classified items and debris after removal from the trench. However, in addition to the containerized materials mentioned above, it may be necessary to transfer uncontainerized unknown materials to the SIP for inspection, sampling and packaging by the subcontractor, as stated in Section 4.5 of the SOW.
 Revise text to be consistent with SOW.
4. Page 14, Section 3.2.2.4, ITEM: G
 Comment:
 Under heading: "Completely Degraded Drums and Soil..."
 First sentence of second paragraph: The boxes will be inspected and sampled **in accordance with the Starmet SAP.**
5. Page 14, Section 3.2.2.4, ITEM: G
 Comment:
 Under heading: "Completely Degraded Drums and Soil..."
 Second to last sentence of section states: "These containers will be managed as described above." For clarity, instead of referring to the description of how the intact drums will be managed, state specifically how the steel boxes will be managed.
6. Page 14, Section 3.2.2.4, ITEM: G
 Comment:
 Under heading "Other Drums and Materials", revise first sentence as follows:
 Drums containing cemented cyanide and still bottoms will be sampled **as per the Starmet SAP, repackaged as necessary**, and returned to RMRS for disposition.
 Reference to Figure 8: Figure 8 does not include step for repackaging cemented cyanide and still bottoms (if necessary).
7. Page 14, Section 3.2.2.4, ITEM: M
 Comment:
 Under heading: "Other Drums and Materials"
 Second paragraph: Describe how debris and unknown materials in containers will be handled at the Starmet facility (i.e., sampling and packaging for appropriate disposal). Add the respective tasks to Figure 4.

REVIEW COMMENT SHEET ATTACHMENT FOR STARMET DRAFT WORK PLAN
(continued)

8. Page 14, Section 3.2.2.5, ITEM: G
Comment:
First sentence: The SAP was designed to support the characterization of specific waste streams **expected** to be generated during T-1 remediation.
9. Page 15, Section 3.2.2.5, ITEM: G
Comment:
Last bullet (arrow): Add **liquids/sludges, and** lathe coolant (Cimcool) drained from intact drums...
10. Page 16, Section 3.2.2.8, ITEM: G
Comment:
Last sentence of first paragraph: Drums and boxes will be segregated and stored in a staging area **at the Starmet facility** before treatment.

Will the staging area be located inside the facility building or outside? If outside, is the area secured (fenced)?
11. Page 16, Section 3.2.2.8, ITEM: M
Comment:
Under heading: "Intact Drums"
Describe how Starmet will manage the mineral oil removed from intact drums (i.e., sampling, disposal).

Describe how Starmet will handle debris, trash, and unknown solid materials (non-DU materials) in drums, if encountered (i.e., sampling, treating, packaging, disposal).

Last sentence of third paragraph states, "Materials that do not meet the quality requirements will be added to the soil/uranium mixture, processed, and packaged for disposal." Indicate what "Materials" includes. State what the quality requirements are (< 90% uranium oxide?).
12. Page 17, Section 3.2.2.8, ITEM: G
Comment:
Under heading: "B-12 Containers"
Third sentence in last paragraph states, "The calcining process **should** eliminate any pyrophoric tendencies of the material." State what Starmet will do if the calcining process is not effective (calcine a second time or as many times as it takes?). State how Starmet will verify that the calcining process is rendering the waste form stable.
13. Page 17, Section 3.2.2.8, ITEM: M
Comment:
Under heading: "Record Keeping"
Include records of final waste form weights and volumes
14. Page 18 and 19, Section 3.2.2.9, ITEM: G
Comment:
Under heading: "Equipment Decontamination" and "Container Decontamination"
Is the term "hydraulically" being used in the proper text?

REVIEW COMMENT SHEET ATTACHMENT FOR STARMET DRAFT WORK PLAN
(continued)

15. Page 19, Section 3.2.2.8, ITEM: G
Comment:
Under heading: "Container Decontamination", last paragraph:
All drums and metal boxes will be externally **cleaned of gross contamination immediately following inerting at the SIP. Final decontamination of the waste packages will be performed at the SIP or in a staging area inside the structure.** The exteriors will undergo...
16. APPENDIX A Sampling and Analysis Plan
Page 3, Section 3.0, ITEM: M
Need to include discussion of sampling of unknown liquids, solids, and sludges in intact drums.
Need to also include sampling approach for mineral oil and possible debris/trash in intact drums.
17. APPENDIX A Sampling and Analysis Plan
Page 5, Section 5.0, ITEM: M
Include sampling equipment and procedures for other solids, liquids, sludges , mineral oil.